

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK**

ANTONIO CABALLERO,

*Plaintiff,*

v.

FUERZAS ARMADAS REVOLUCIONARIAS DE  
COLOMBIA, ET AL.,

*Defendants.*

Civil Case No. 20-MC-00040-LJV

**REPLY OF THE UNITED STATES OF AMERICA TO THE PARTIES BRIEFS FILED  
IN RESPONSE TO THE STATEMENT OF INTEREST**

The United States filed a Statement of Interest in this matter on September 20, 2022, ECF No. 125, to which the Plaintiff and PDVSA entities (together the “Parties”) responded on October 31, 2022, ECF Nos. 131, 132. The Court has also set a briefing schedule by which any reply by the United States to these responses shall be due on December 15, 2022. *See* ECF Nos. 122, 127.

The United States has reviewed the responses by the Parties, and it respectfully informs the Court that it has determined it will stand on the arguments and analysis put forward in its Statement of Interest. Such a determination does not constitute either an acceptance or a concession of any arguments put forward by the Parties in their briefs.

The United States appreciates the Court’s patience and consideration in this matter.

Dated December 15, 2022

Respectfully submitted,

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General

ANTHONY J. COPPOLINO  
Deputy Branch Director

DIANE KELLEHER  
Assistant Branch Director

/s/Joseph E. Borson  
JOSEPH E. BORSON (Va. Bar No. 85519)  
Trial Attorney  
U. S. Department of Justice  
Civil Division, Federal Programs Branch  
1100 L St., NW  
Washington, D.C. 20005  
Tel. (202) 514-1944  
Email: joseph.borson@usdoj.gov

*Counsel for the United States of America*